

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

-against-

JASON GALANIS, *et al.*,

Defendants.

Case No. 16-cr-371 (RA)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the annexed memorandum of law, and upon all prior proceedings herein, Defendant Gary Hirst (“Hirst”), by his attorneys, Sher Tremonte LLP, will move this Court before the Honorable Ronnie Abrams, United States District Judge for the Southern District of New York, sitting at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 1506, New York, New York, on the 12th day of February at 9:00 am, or as soon as counsel can be heard, for an order severing Hirst’s trial from the trial of all other Defendants in this action.

Dated: New York, New York  
January 16, 2016

/s/ Michael Tremonte  
Michael Tremonte  
Noam Biale  
Emily Burgess  
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To: Geoffrey S. Berman, Esq.  
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